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Attorney for Defendant
MIGUEL ANGEL SANCHEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	
)	Case No. CR.S-04-381-FCD
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER;
)	EXCLUSION OF TIME
)	
)	
MIGUEL ANGEL SANCHEZ, et al.,)	Date: October 24, 2005
)	Time: 9:30 a.m.
Defendant.)	Judge: Honorable Frank C. Damrell

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, SAMUEL WONG, Assistant United States Attorney, attorney for Plaintiff, MARK J. REICHEL, CHRIS HAYDEN-MAYER, ESQ., JESSE SANTANA, ESQ., attorneys for all defendants, that the previously scheduled change of plea hearing date of October 17, 2005 be vacated and the matter set for change of plea on October 24, 2005 at 9:30 am.

This continuance is requested because all defense counsel need additional time to continue to review discovery with the defendant, conduct legal research, perform background factual investigation, and properly prepare for a change of plea, including calculating guideline

Stip and Order

1 ranges and potential sentences.

2 Accordingly, all counsel and the defendant agree that time under
3 the Speedy Trial Act from the date this stipulation is lodged, through
4 October 24, 2005, should be excluded in computing the time within which
5 trial must commence under the Speedy Trial Act, pursuant to Title 18
6 U.S.C. § 3161 (H) (8) (B) (iv) and Local Code T4.

7 DATED: October 14, 2005.

Respectfully submitted,

8 QUIN DENVIR
9 Federal Public Defender

10 DATED: October 14, 2005.

11 /s/MARK J. REICHEL
12 MARK J. REICHEL
13 Assistant Federal Defender
14 Attorney for Defendant

15 /s/MARK J. REICHEL
16 CHRISTOPHER HAYDEN MEYER, ESQ
17 Attorney for Defendant

18 /s/MARK J. REICHEL
19 JESSE SANTANA, ESQ
20 Attorney for Defendant

21 MCGREGOR SCOTT
22 United States Attorney

23 DATED: October 14, 2005.

24 /s/MARK J. REICHEL for
25 SAMUEL WONG
26 Assistant U.S. Attorney
27 Attorney for Plaintiff
28

O R D E R

The change of plea hearing date of October 17, 2005 is vacated and the matter set for change of plea on October 24, 2005 at 9:30 am. The court finds that the interests of justice in granting the continuance outweighs the public's interest in a speedy trial and therefore time is excluded in the interests of justice pursuant to 18 U.S.C. § 3161 (H) (8) (B) (iv) and Local Code T4.

IT IS SO ORDERED.

DATED: October 14 2005

/s/ Frank C. Damrell Jr.
FRANK C. DAMRELL, JR.
United States DISTRICT JUDGE